

Philip T. Simpson, Esq. (PS-9707)
Robinson Brog Leinwand Greene Genovese & Gluck P.C.
1345 Avenue of the Americas
New York, New York 10105-0143
Attorney for Plaintiff

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
CATHAY BANK,

Plaintiff,

-against-

UNITED ALUMINUM DOOR INC., VERY-TACT
INTERNATIONAL, INC., ARCHIVISIONS, INC.,
WAH WOON TAM a/k/a WAYNE TAM, JEN-
HAO MAO, SANDY LIANG, KUO WIN LIU,

Defendants.
-----X

Civil Action No.: 07 CV 4152 (DC)

**DECLARATION OF
MICHAEL CREITH**

MICHAEL CREITH declares under penalties of perjury, pursuant to 28 U.S.C.
§ 1746, as follows:

1. I am a Vice President of Cathay Bank, formerly known as General Bank. I have knowledge of the facts and circumstances of this matter.
2. I submit this declaration in further support of plaintiff's application for a preliminary injunction and other relief.
3. Attached hereto are an email and a debit instruction that I received from United Aluminum Door on or about June 6, 2007. I understand that this was after this Court issued an oral temporary restraining order, on the record and in the presence of counsel for United Aluminum Door.

4. The email and the debit instruction ask that Cathay Bank debit an account of United Aluminum Door in order to pay interest on a personal loan taken out by Wayne Tam. In other words, United Aluminum Door asked the bank to use United Aluminum Door's funds to pay a personal obligation of its president.

5. Of course the bank refused to engage in this transaction. Nonetheless, that United Aluminum Door would attempt to have its own funds used to pay a personal debt of its president, contrary to an order of this Court, raises substantial concern about whether United Aluminum Door will in fact preserve the collateral on which Cathay Bank has a security interest.

WHEREFORE, it is respectfully requested that plaintiff's application for a preliminary injunction and other relief be granted, together with such other and further relief as to this Court deems just, proper and equitable.

Michael Creith v.p.

MICHAEL CREITH

Philip T. Simpson

From: Ronald B. Goodman
Sent: Friday, June 08, 2007 12:38 PM
To: Philip T. Simpson
Subject: FW: interest payment

From: Roger A. Raimond
Sent: Fri 6/8/2007 10:54 AM
To: Ronald B. Goodman
Subject: FW: interest payment

fyi

Roger A Raimond
Robinson Brog et. al.
1345 Avenue of America's 31st Flr
New York, NY 10105
(212) 603-6340
(212) 956-2164 fax

-----Original Message-----

From: Michael_Creith@cathaybank.com [mailto:Michael_Creith@cathaybank.com]
Sent: Friday, June 08, 2007 10:50 AM
To: Gregory_Badura@cathaybank.com
Cc: Roger A. Raimond
Subject: Fw: interest payment

Michael Creith
Vice President
Cathay Bank
17271 Gale Avenue, City of Industry, Ca 91748
Phone # 626-581-0440 ext.204
Fax # 626-964-1138
E-mail michael_creith@cathaybank.com

----- Forwarded by Michael Creith/CathayBank on 06/08/2007 07:49 AM -----

"Anita Poon" <anitapoon@uadgroup.com>

06/08/2007 07:29 AM

To <Michael_Creith@cathaybank.com>

cc "Wayne Tam" <wayne@uadgroup.com>

Subject interest payment

Dear Michael,

6/14/2007

Attached is the authorization letter for withdraw 16,500.00 from UAD Cathay Bank checking to repay Wayne Tam's personal loan, please confirm to me for this transaction.

Best Regards,

Anita Poon

UAD Group

www.uadgroup.com

anitapoon@uadgroup.com

Tel: 718.599.0350

Fax: 718.599.3592

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www.cathaybank.com

6/14/2007

UNITED ALUMINUM DOOR INC.
267 VANDERVOORT AVENUE
BROOKLYN NY 11211
TEL: 718-599-0350 FAX: 718-599-1202

Cathay Bank
17271 Gale Ave.
City of Industry, CA 91748

Attn: Michael Creith -- V.P.
Fax: 626/581-0440

Date 06/08/07

Re: Debit Payment

Dear Michael,

**Under the instruction of Wayne Tam, please debit \$ 16,500.00 on 6/8/07 from
our checking account No. 5080-7601 to repay interest for loan# 586-00-212.**

Best regards,

Anita Poon/ Wayne Tam